

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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U.S. DEPT. OF COMMERCE
WASHINGTON, D.C.

Mailing Online Service)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: DANIEL STIREWALT
(OCA/USPS-T3-75-83)
October 27, 1998

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

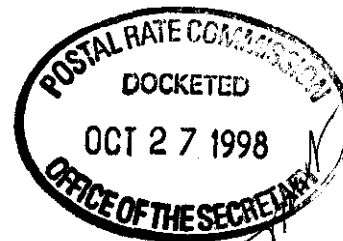
Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Shelley S. Dreifuss

Shelley S. Dreifuss
Attorney



OCA/USPS-T3-75. Please refer to your response to OCA/USPS-T3-61. Please confirm that the 1800 workhours per "resource year" represent the *equivalent* of one Technical Help Desk personnel. If you do not confirm, please explain.

OCA/USPS-T3-76. Please refer to your response to OCA/USPS-T3-63.

- a. Please confirm that it is the staff of the PostOffice Online Help Desk that makes an inquiry or problem report to the Technical Help Desk. If you do not confirm, please explain.
- b. Please confirm that it is the staff of the PostOffice Online Help Desk that makes an inquiry or problem report to the Technical Help Desk as a result of customer calls to the PostOffice Online Help Desk. If you do not confirm, please explain.
- c. Please confirm that the staff members of the PostOffice Online Help Desk acts as an intermediary between the Mailing Online Customer and the Technical Help Desk. If you do not confirm, please explain.
- d. Please confirm that the staff of the PostOffice Online Help Desk are "generalists" in that they are not experts in the technical aspects of the operation of Mailing Online. If you do not confirm, please explain and describe the level of expertise of the staff of the PostOffice Online Help Desk with respect to Mailing Online.
- e. Please confirm that under no circumstances are Mailing Online customers able to speak to Technical Help Desk personnel. If you do not confirm, please explain under what circumstances or conditions Mailing Online customers with technical questions can speak to Technical Help Desk personnel.

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- f. Please confirm that the role of the staff of the PostOffice Online Help Desk as intermediaries increases the chances for misunderstanding, thereby increasing the amount of time to respond to customer calls requiring the assistance of the Technical Help Desk. If you do not confirm, please explain.

OCA/USPS-T3-77. Please refer to USPS-LR-1/MC98-1, Attachments 1 and 2.

- a. Please provide, in hardcopy and in electronic format, a new version of USPS-LR-1/MC98-1, Attachments 1 and 2, that is up-to-date in that it reflects the current procedures for operating Mailing Online and corrects all known errors.
- b. To the extent that the procedures for operating Mailing Online (e.g. Telecommunications Internet Connection, Processing Center - Application Server, Processing Center - Netpost Command Center Server, etc.) reflected in the hardcopy and electronic material provided in response to part (a) of this interrogatory are expected to change, please identify those procedures.

OCA/USPS-T3-78. Please refer to your response to OCA/USPS-T3-68(a).

- a. Please provide a date at which time Mailing Online software will accept customer files in PDF format.
- b. Please explain the reasons the current Mailing Online software does not accept files in PDF format.

OCA/USPS-T3-79. Please refer to your response to OCA/USPS-T3-71. Since you did not assume that files contain only plain text, please identify, and provide the number of bytes associated with, files other than plain text files.

OCA/USPS-T3-80. In your response to OCA/USPS-T3-35(e), you state, "The current Mailing Online system transmits all jobs to the print site in Postscript format." Please reconcile the statement quoted above with your response to OCA/USPS-T3-72(c), which states, "The San Mateo processing center forwards all print jobs to the print site in PDF format."

OCA/USPS-T3-81. Please refer to your response to OCA/USPS-T3-72(c).

- a. Please identify the applications currently supported by the Mailing Online software.
- b. Please identify the applications in part (a) of this interrogatory that permit the creation of files in a PDF format.
- c. Please identify the applications in part (a) of this interrogatory that permit Mailing Online customers to create files in a Postscript format.
- d. Please confirm that Mailing Online customers can submit files in Postscript format. If you do not confirm, please explain.

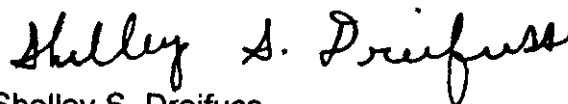
OCA/USPS-T3-82. Please refer to your response to OCA/USPS-T3-72(c). In that response, you state, "The San Mateo processing center forwards all print jobs to the print site in PDF format." If San Mateo is able to process print jobs in PDF format for

transmittal to the print sites, please explain why the San Mateo processing center is unable to accept Mailing Online customer files in PDF format.

OCA/USPS-T3-83. Please refer to your response to OCA/USPS-T3-72(b). In that response, you did not confirm that "the San Mateo processing center processes files received from customers in PDF format." Please identify the format used by the San Mateo processing center to process files.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

A handwritten signature in black ink, reading "Shelley S. Dreifuss". The signature is written in a cursive, flowing style.

Shelley S. Dreifuss
Attorney

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